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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 92-77
Billed Party Preference for 0+ InterLATA Calls	)	
	)	

DOCKET FILE COPY ORIGINAL

REPLY

BellSouth Telecommunications, Inc. ("BellSouth") herewith submits its reply comments in the above-entitled proceeding. The interest and concern generated by this docket has been overwhelming, with nearly 200 participants submitting initial comments on August 1, 1994. Of these, the vast majority oppose implementation of billed party preference (BPP). Opposition to BPP is found among large and small LECs, large and small IXCs, operator service providers (OSPs), competitive access providers, call aggregators and state commissions. Notwithstanding the diversity of interests represented, these parties are unanimous in their conclusion that the promised benefits of BPP are overstated and will in no way compensate for the vast expenditure of capital and other resources necessary to the implementation of BPP technology. Given such a record, the Commission cannot reasonably order the implementation of BPP at this time nor commit the billions of dollars and other industry resources which would be required for such an effort.

1. The costs to implement BPP are staggering.

The Commission has estimated LEC start-up costs for BPP to be approximately $1.1 Billion, based upon earlier projections.[1] This figure (by no means insubstantial) has now increased to $1.3 Billion in LEC capital outlay and nonrecurring expense.[2] Likewise, the FNPRM estimates a further $120 Million in operator service provider costs for BPP implementation; however, this projection too appears conservative since it is based upon AT&T expenditures of $68 Million and includes cost data from only the three largest IXCs.[3]

The FNPRM projection of annual LEC recurring expenses is also understated. In contrast to the Commission's estimate of $60 Million for the entire LEC industry,[4] data compiled by BellSouth suggests that this company alone will incur annual recurring expenses of $29 Million for BPP implementation.[5] This is commensurate with estimates from Ameritech ($35 Million),[6] NYNEX ($23.1 Million),[7] SNET ($11-

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[1] In the Matter of Billed Party Preference for 0+ InterLATA Calls, CC Docket No. 92-77, Further Notice of Proposed Rulemaking, 9 FCC Rcd 3320 (1994), para. 20 (hereinafter "FNPRM").

[2] The new estimate is obtained by summing projections submitted by the RBOCs, GTE, Sprint, USTA, CBT and SNET in initial comments.

[3] Current AT&T projections are $80-$100 Million in BPP start-up costs. AT&T, p. 21.

[4] FNPRM, para. 20.

[5] BellSouth, p. 15.

[6] Ameritech, p. 10.

[7] NYNEX, Attachment C.

$14 Million),[8]and GTE ($52.3-$52.6 Million).[9] Even if the more conservative projections of Bell Atlantic ($9 Million)[10] and SWBT ($15.3-$16.5 Million)[11] are used to formulate an estimate of total LEC recurring costs, it is apparent that the resulting figure will vastly exceed the $60 Million posited in the FNPRM.

Finally, as many commenters have observed, the FNPRM makes no allowance for other elements of cost, such as LEC overheads, nor for other service features which--if implemented--could significantly add to the total cost of BPP deployment. The latter include 14-digit screening of line number based cards and the capability of processing commercial credit cards. All of these matters undermine the FNPRM estimate of implementation costs and compel its rejection as a tool for evaluating the merits of BPP technology.

2. The FNPRM overstates the benefits attributable to BPP.

The FNPRM assigns a value of $620 Million annually to the adoption of BPP, to be realized through customer migration from higher priced OSPs and the elimination of commission payments to aggregators. BellSouth and other

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8 SNET, pp. 5-7 and n. 21.

9 GTE, p. 9.

10 Bell Atlantic, p. 12.

11 SWBT, p. 6; App. A and B.

commenters have demonstrated the fallacy of these assumptions. The availability of access code dialing permits free carrier selection from virtually any telephone--a circumstance which exerts downward pressure on the rates of higher priced OSPs.[12] Indeed, the range of rates between the three largest IXCs and third-tier providers has continued to narrow, rendering the Commission's use of a $0.19 differential suspect.[13] Finally, as AT&T points out, it is highly improbable that any rate differential would persist unchanged over a period of years, notwithstanding massive loss of market share by the higher priced OSPs.[14]

Equally vulnerable is the Commission's projection of a $340 Million benefit through the elimination of interLATA 0+ commissions. Many members of the independent pay telephone

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[12] AT&T has documented pervasive consumer knowledge of access codes such as 1-800-OPERATOR, 1-800-CALL-ATT and 1-800-COLLECT and states that use of the 1-800-CALL-ATT number has increased by 10% each month since its introduction earlier this year. AT&T, p. 8. These findings are consistent with results from an August 1994 BellSouth survey, which show that 70.9% of business customers and 68.6% of residence customers are familiar with the 1-800-CALL-ATT dialing convention. Similar results were obtained for 1-800-COLLECT, with 72.8% of business respondents and 64.2% of residence indicating recognition of the service. A total of 684 customers participated in the survey out of 2,042 randomly selected business and residence subscribers who were contacted by BellSouth.

[13] Since initial comments were filed in this proceeding, AT&T has again requested authorization to raise rates on domestic calling card calls. AT&T Seeks Rise in Some Rates, Wall St. J., Aug. 30, 1994 at B5.

[14] AT&T, p. 6.

industry assert that loss of this revenue stream will ultimately reduce the availability and diversity of payphone services.[15] This assessment is made more compelling by the lack of any evidence as to what would constitute a reasonable level of compensation to payphone providers in the absence of commission revenue.[16] Aggregators too have expressed alarm at the prospective loss of commission payments, which are used to support an array of institutional operations and services.[17] If BPP is implemented, these parties must inevitably seek alternative revenue sources or curtail programs and services now subsidized through interLATA 0+ commissions. The pecuniary and social cost of these modifications, while impossible to quantify, cannot be ignored in any assessment of the merits of implementing BPP.

3. Less costly and more direct measures are available to achieve the Commission's competitive goals.

As the record of this proceeding overwhelmingly demonstrates, customer autonomy in IXC selection is already an accomplished fact. The proliferation of access code dialing arrangements and Commission measures to insure

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[15] APCC, pp. 15-21; CMS, p. 3; FPTA, p.3.

[16] APCC in its comments maintains that a payment of $12 per phone per month as proposed by the FNPRM would not be sufficiently compensatory. APCC, p. 15.

[17] *See*, *e.g.*, Comments of ACI-NA; ACE and NACUBO; City of Austin Texas.

compliance with TOCSIA requirements have generally eliminated the abuses BPP was intended to address. To the extent a need remains to correct the market behavior of some OSPs and foster greater competition in the operator services industry, these goals are achievable through more direct and less costly means than the global alternative of BPP.

Numerous parties advance proposals for Commission regulation of OSP rates through rate caps or benchmarking. This approach provides a viable means for directly addressing the problem of excessive OSP prices with none of the dislocations and massive expenditure required to deploy BPP. As such, it merits further study by the Commission.

To lessen the effects of AT&T's massive embedded subscriber base and encourage a more competitive payphone services market; BellSouth reiterates its support of the 0+ Public Domain concept, which would require all calling card issuers to make validation data generally available on reasonable and nondiscriminatory terms. As BellSouth has frequently pointed out, this approach constitutes sound jurisprudence as well as good public policy and should be adopted by the Commission.[18]

Lastly, competition continues to spur the development of many new products and services which provide alternative call routing and/or which supplant altogether traditional

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[18] BellSouth is not alone in its support of 0+ Public Domain. See Comments of LDDS, p. 11; Pacific Bell, p. 9, ONCOR, p. 19.

wireline technology. Some of these offerings are described in BellSouth's initial comments. Further innovation can best be encouraged by allowing LECs, IXCs and OSPs the latitude to develop customized responses to market needs without the encumbrance of a pervasive BPP technology.

4. <u>If BPP is adopted, all users of the public switched network must bear the costs of implementation.</u>

As a general matter, recovery of costs from the cost causer represents both the most equitable and the most economically efficient pricing philosophy. Nevertheless, this approach cannot be applied to BPP, given the substantial costs of the service and the significant potential for IXC bypass.[19] If cost recovery is limited to BPP users, erosion of demand will ultimately create a service which is unaffordable to all and result in millions of dollars of stranded LEC investment.[20]

A reasonable cost recovery mechanism is critical to the viability of any BPP offering. Hence, this issue cannot be deferred until implementation of the service is underway, as

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[19] AT&T itself acknowledges that it is not "clear that all of the major carriers would seek to take advantage of BPP by encouraging their customers to dial '0' and pay the additional costs of BPP." AT&T, p. 23 at n. 36.

[20] Even LEC proponents of BPP are acutely aware of this potential. Thus Pacific Bell conditions its support on the guarantee of a mechanism for full cost recovery; while SWBT insists upon a prohibition of aggregator bypass and prompt Commission redress of any threat to BPP service demand. Pacific Bell, pp. 1-3; SWBT, pp. 12-13.

one commenter has suggested.[21] For the Commission to order a capital outlay of the magnitude required by BPP without first providing an adequate method for LEC cost recovery would be a confiscatory action and legally unsustainable.

CONCLUSION

Representatives from all segments of the telecommunications industry have expressed vigorous opposition to the deployment of BPP. Their concerns are substantial and well founded. The stated goals of BPP technology have largely been achieved, while the costs (financial and otherwise) of implementing BPP remain, by any reasonable standard of measurement, enormous. To the extent abuses persist in the industry, the Commission has alternative means at its disposal to curb unreasonable pricing behavior and foster the development of a more competitive operator services market.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: Helen A. Shockey

M. Robert Sutherland
Richard M. Sbaratta
Helen A. Shockey

Its Attorneys
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
(404) 614-4904

DATE: September 14, 1994

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[21] Sprint, pp. 42-43.

CERTIFICATE OF SERVICE

I hereby certify that I have this 14th day of September, 1994 served all parties to this action with a copy of the foregoing REPLY by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties listed on the attached service list.

Juanita H. Lee

Juanita H. Lee

SERVICE LIST
CC Docket 92-77

Charles H. Helein
America's Carriers Telecommunications Association
Helein & Waysdorf, P. C.
Suite 550, 1850 M Street, N.W.
Washington, D. C. 20036

John T. Lenahan
Frank M. Panek
Larry A. Peck
Ameritech Operating Companies
2000 W. Ameritech Center Drive
Room 4H86
Hoffman Estates, IL 60196-1025

Brad E. Mutschelknaus
Ann M. Plaza
Ameritel Pay Phones, Inc.
Wiley, Rein & Fielding
1776 K Street, N. W.
Washington, D. C. 20006

Amy S. Gross
American Network Exchange, Inc.
101 Park Avenue
Suite 2507
New York, NY 10178

Albert H. Kramer
Robert F. Aldrich
American Public Communications Council
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Washington, D. C. 20005-3919

Mark C. Rosenblum
Robert J. McKee
Richard H. Rubin
AT&T Corporation
Room 3254A2
295 North Maple Avenue
Basking Ridge, New Jersey 07920

Paul J. Berman
Alane C. Weixel
Anchorage Telephone Utility
Covington & Burling
1201 Pennsylvania Avenue, N. W.
P. O. Box 7566
Washington, D. C. 20044-7566

John M. Goodman
Bell Atlantic Telephone Company
1710 H Street, N. W.
Washington, D. C. 20006

John Russell
Days Inns of America, Inc.
339 Jefferson Road
Parsippany, NJ 07054

Michael H. Davis
Vice President
Holiday Inn World
Corporate Headquarters
Three Ravina Drive, Suite 2000
Atlanta, Georgia 30346-2149

Eric E. Pfeffer, CHA
President and C.O.O.
Howard Johnson Franchise Systems, Inc.
339 Jefferson Road
Parsippany, NJ 07054

Bruce Maher
President
LITS, Inc.
3900 W. Brown Deer Road
Suite A122
Milwaukee, WI 53209

Gaines P. Sturdivant, CHA
President
M M I Hotel Group
1817 Crane Ridge Drive
Jackson, MS 39216

Ronald A. Belz
Vice President
Peabody Hotel Group
5118 Park Avenue, Suite 245
Memphis, TN 38117

W. Scott Deaver
Vice President Marketing
Ramada Franchise Systems, Inc.
339 Jefferson Road, P.O. Box 278
Parsippany, NJ 07054-0278

Robert N. Weller
President
Super 8 Motels, Inc.
339 Jefferson Road
Parsippany, NJ 07054

Branson Telephone
P. O. Box 1944
Branson, MO 65615

Robert J. Beni
Manager-Administrative Services
The Circle K Corporation
P. O. Box 52085
Phoenix, AZ 85072

Jerry T. Beddow, COO
Cherokee Communications
P. O. Box 549
Jacksonville, TX 75766

Michael W. Scott, CEO
Communication Management Systems, Inc.
731 Walker Road, Suite H-2
Great Falls, VA 22066

William F. Shepard
President
Global TelLink
2609 Cameron Street
Mobile, ALA 36607

Thomas E. May
Controller
Mid Cal Auto
12310 S. Highway 33 & I-5
Santa Nella, CA 95322

Perry R. Owen
Business Owner
Owen's Public Phone & Fax
P. O. Box 60474
Sacramento,CA 95860

Vincent Townsend
President
PayTel Communications, Inc.
P. O. Box 8179
Greensboro, NC 27419

Donald G. Raider
Park Inn International
339 Jefferson Road
Parsippany, NJ 07054

Janice M. Doherty
President
Public Payphones, Inc.
119 Scully Drive
Schaumburg, IL 60193

Linda L. Tratnik
President
SDN Users Association, Inc.
P. O. Box 4014
Bridgewater, NJ 08807

Roger C. DuCharme
Vice President-Sales & Marketing
Tele-Matic Corporation
6675 South Kenton Street
Englewood, CO 80111

Howard Porter
Director of Computing Services
Adams State College
Alamosa, CO 81102

Sheldon Elliot Steinbach
Vice President and General Counsel
American Council on Education
One Dupont Circle, NW
Washington, DC 20036

Anne Gross
Program Manager
Public Policy and Management Programs
National Association of College
and University Business Officers
One Dupont Circle, NW
Washington, DC 20036

Danny Gmeiner
Acting Director-Telecommunications
The Claremont Colleges
330 E. Eighth Street
Claremont, CA 91711-5912

Bob Francisco
Director Of Student Life
Colorado School of Mines
1600 Maple Street
Golden, CO 80401

Robert P. Bigelow
22 Grove Place #30
Winchester, Mass 01890

James E. Lewis
P. O. Box 689
Ely, NV 89301

Daniel J. & Elaine Rooks
4250 Blackland Drive
Marietta, Georgia 30067

Bryon Swanson
Coffee Pot Cafe
7120 E. 49th Avenue
Commerce City, CO 80022

Andrew D. Lipman
Jean L. Kiddo
Ann P. Morton
Airports Association
Council International -NA
Swidler & Berlin, Chtd.
300 K Street, N.W., Suite 300
Washington, DC 20007

Charles M. Barclay, A.A.E.
President
American Association of
Airport Executives
4212 King Street
Alexandria, VA 22302

Carl L. Remmel
Assistant Director of Aviation
Aspen/Pitkin County Airport
0233 East Airport Road
Aspen, Colorado 81611

John W. Anderson, A.A.E.
Airport Director
Boise Air Terminal Gowen Field
3201 Airport Way
Bosise, Idaho 83705-5096

Charles W. Gates
Director of Aviation
City of Austin
3600 Manor Road
Austin, TX 78723

Thomas P. Engel
Director of Airports
County of Sacramento
6900 Airport Boulevard
Sacramento, AL 95837

Troy W. Stover
Administrative Support I
Jeffco Airport
11755 Airport Way
Terminal Building
Broomfield, CO 80021

Robert N. BroadBent
Director of Aviation
Las Vegas McCarran
International Airport
P. O. Box 11005
Las Vegas, NV 89111-1005

Emily Reginer
Airport Properties Department
Oakland International Airport
9532 Earhart Road
Oakland, CA 94621

Karl D. Myers
Director-Business &
Property Management
Seattle-Tacoma International
P. O. Box 68727
Seattle, WA 98168

James P. Elwood, A.A.E.
Director of Aviation
City of Pueblo
31201 Bryant Circle
Pueblo, CO 81001

John Wheat
Executive Deputy Director
Salt Lake City Airport Authority
AMF Box 22084
Salt Lake City, Utah 84122

Lynn Carlton
Director of Properties
and Contracts
Spokane International Airport
P. O. Box 19186
Spokane, Washington 99219-9186

Brent A. Kitchen
Airports Director
Tulsa Airport Authority
P. O. Box 581838
Tulsa Oklahoma 74158

Dwight W. Greenlee
Director of Airport Adm.
Wichita Airport Authority
2173 Air Cargo Road
P. O. Box 9130
Wichita, Kansas 67277-0130

John M. Bisinger
Senior Vice President
AHA TelePLAN
515 North State Street
Suite 2850
Chicago, ILL 60610

Kellie Phillips
Director of Operator Svcs.
Call America Business Comm.
4251 South Higuera
San Luis Obispo, CA 93401

Susan M. Shanaman
The Central Atlantic
Payphone Association
21 North 4th Street
Harrisburg, PA 17101

William M. Barvick
Midwest Independent Coin
Payphone Association
240 East High Street, #202
Jefferson City, Missouri 65101

Ibert Mednicoff
President
Nevada PayPhone Association
4620 S. Arville, Suite H
Las Vegas, NV 89103

Ronald J. Polli
President
New Jersey PayPhone Association, Inc.
108 Main Street
Oceanport, NJ 07757

Vincent Townsend
President
North Carolina Payphone Association, Inc.
9 Oak Branch Drive
Greensboro, NC 27407

Edward J. Camp, Sheriff
Penny Brown, Deputy Chief
Adams County Sheriff's Department
1901 East Bridge Street
Brighton, CO 80601-1937

Buford L. Cribb
Warden
Adelanto Community
Correctional Facility
10400 Rancho Road
P. O. Box 5005
Adelanto, CA 82301-724

Stanley F. Bates
Assistant Director
Arizona Department of Corrections
1601 West Jefferson Street
Phoenix, Arizona 85007-3003

Lieutenant Nancy Underhill
Jail Administrator
Baker County Detention Center
56 N. 2nd Street
MacClenny, FL 32063

James R. Drach
Captain/Jail Administrator
Berrien County Sheriff Department
919 Port Street
St. Joseph, Michigan 49085

James H. Gomez
Director of Corrections
Department of Corrections
P. O. Box 942883
Sacramento, CA 94283-0001

William B. Kolender
Director Department of The
Youth Authority
4251 Williamsbourgh Drive
Sacramento, CA 95823

Keith L. Whitlatch
Cedar County Sheriff
Cedar County Courthouse
Tipton, Iowa 52772

Thomas G. Frame, Warden
Chester County Prison
501 S. Wawaset Road
West Chester, PA 19382

Fred A. Spruill
Sheriff-Chowan County North Carolina
P. O. Box 78
Edenton, NC 27932

Eugene F. Mullin
Christopher A. Holt
Citizens United For
Rehabilitation of Errants
Mullin, Rhyne, Emmons & Topel, P.C.
1225 Connecticut Avenue, NW, Suite 300
Washington, D.C. 20036-2604

Daniel E. Hornberger, Warden
Clarion County Prison
5th & Madison
Clarion, PA 16214

Garry E. Lucas
Sheriff of Clark County
707 West 13th Street
P. O. Box 410
Vancouver, Washington 98666

James P. Drury, CSOC President
John L. Kammerzell, Ex. Director
County Sheriffs of Colorado
11160 North Huron, Suite 31
Northglenn, CO 80234

Carl Poteete
Sheriff of Conway County
Conway County
Morrilton, Arkansas 72110

Lt. Eddy Markham
Jail Administrator
Eddy County Sheriff's Department
P. O. Box 1240
Carlsbad, New Mexico 88220

David R. Rodrigues
Deputy Warden of Operations
County of Erie
139 West 5th Street
Erie, PA 16507

Kathleen M. Hawk
Director
Federal Bureau of Prisons
U.S. Department of Justice
Washington, DC 20534

Harry K. Singletary, Jr.
Secretary
Florida Department of Corrections
2601 Blair Stone Road
Tallahassee, FL 32399-25000

J. M. "Buddy" Phillips
Executive Director
Post Office Box 12519
Tallahassee, FL 32317-2519

Carl R. Harbaugh, Sheriff
Frederick County Sheriff's
Office Courthouse
100 W. Patrick Street
Frederick, Maryland 21701

Keith J. McLean
Detention Administrator
County of Georgetown
Detention Center
505 North Merriman
Georgetown, SC 29440

Perry R. Eichor
Director
Department of Community Services
20 McGee Street
Greenville, SC 29601

William C. Duncil
Warden
Huttonville Correctional Center
P. O. Box One
Huttonsville, West Virginia 26273

Daniel B. Calvert, Sheriff
Josephine County Sheriff's Office
500 N.W. 6th/Courthouse
Grants Pass, Oregon 97526

Marlan Tevis
Assistant Director of Corrections
777 E. Fabyan Parkway
Batavia, IL 60510

Ronald Johnson
Supervisor-Chairman
County of Kenosha
Board of Supervisors
912 56th Street
Kenosha, Wisconsin 53140

Commander Donald L. Fredenburg
Kern County Sheriff
Minimum Security Facility
17635 Industrial Farm Road
Bakersfield, CA 93308

Lawrence C. Lesza
Director of Corrections
Lake County Sheriff's Department
20 South County Street
Waukegan, ILL 60085

Vincent A. Guarini
Warden
Lancaster County Prison
625 E. King Street
Lancaster, PA 17602

Leslie Johnson, Captain
Sandra Schilling, Captain
Facility Co-Administrator
Larimer County Detention Center
2405 Midpoint Drive
Fort Collins, CO 80525

Richard O. Klotz
Director of Corrections
County of Lehigh
38 North 4th Street
Allentown, PA 18105

Jeffery A. Page
Lieutenant (Jail Commander)
Lyon County Jail
30 Nevin Way
Yerington, Nevada 89447

John S. Gardner
Office of Marion County Sheriff
40 South Alabama Street
Indianapolis, Indiana 46204

James Tuso
Sheriff-Coroner
Mendocino County
951 Low Gap Road
Ukiah, CA 95482

Tom Sawyer, Sheriff-Coroner
Merced County Sheriff's Department
700 W. 2222 "M" Street
Merced, CA 95340

Kenneth L. McGinnis, Director
Michigan Department of Corrections
P. O.Box 30003
Lansing, Michigan 48909

W. James Falkenstein
Jail Administrator
Midland County Sheriff's Department
301 West Main Street
Midland, Michigan 48640

Frank W. Wood
Commissioner
Minnesota Department of Corrections
300 Bigelow Building
450 North Syndicate Street
St. Paul, Minnesota 55104

Anthony W. Pellicane
Director of Corrections
Monmouth County Department
of Corrections
1 Waterworks Road
Freehold, NJ 07728

Paul E. Brodeur
Commissioner
State of New Hampshire
Department of Corrections
105 Pleasant Street
Main Building, 4th Floor
Concord, NH 03302-1806

Thomas A. Coughlin, III
Commissioner
State of New York
Department of Correctional Services
The State Office Building Campus
Albany, NY 12226

Tim Schuetzle, Warden
North Dakota State Penitentiary
P. O. Box 5521
Bismarck, ND 58502-5521

Gerald F. Washburn
Sheriff, Oneida County
Office of the Sheriff
Law Enforcement Building
Oriskany, NY 13424-2271

Jim West
Administrator-Information Services
State of Oklahoma
3400 Martin Luther Avenue
P.O. Box 11400
Oklahoma City, OK 73136-0400

Don Hass, President
Oklahoma Sheriffs' Association
P. O. Box 1094
Norman, OK 73070

Patricia R. Tappan
Commissioner
Department of Correction
Onondaga County
P.O. Box 143
Jamesville, NY 13078

Jean L. Kiddoo
Dana Frix
OPUS Correctional Inc.
D/B/A Loctel
Swidler & Berlin, CHTD.
3000 K Street, NW, Suite 300
Washington, D.C. 20007

Samuel D. Hiller
Sheriff of Perry County
P. O. Box 350
Pinckneyville, IL 62274

Thomas M. Rice
Charles E. Buchholz
Debra Andrews
Prairie Correctional Facility
445 S. Munsterman
P. O. Box 157
Appleton, MN 56208

Dennis Kornwolf
County Executive
Racine County Wisconsin
730 Wisconsin Avenue
Racine, WI 53403

George A. Vose, Jr.
Director
R.I. Department of Corrections
40 Howard Avenue
Cranston, RI 02920

James A. McCaulley
Director
Richland County Detention Center
1400 Hugher Street
Columbia, SC 29201

Jean L. Kiddoo
Ann P. Morton
Robert Cefail & Associates
American Inmate Communications, Inc.
Swidler & Berlin, CHTD.
3000 K Street, N.W., Suite 300
Washington, DC 20007

H.R. Trantham
Adm. Asst.
San Jacinto County
Office of Sheriff
P. O Box 7
Coldspring, TX 77331

Leroy Moody
Sheriff
San Patricio County
P. O. Box 1382
Sinton, TX 78387-1382

Capt. Rick Adkins
Division Commander
Shasta County Sheriff's Dept.
Mail Jail Facility
1655 West Street
Redding, CA 96001

Parker Evatt
South Carolina Department
Of Corrections
P.O. Box 21787
4444 Broad River Road
Columbia, SC 29221

Harold Brown
President
South Carolina Jail
Administrators Association
P. O. Box 4046
Anderson, SC 29622

Brian Redmond
President
South Carolina Jail Association
1400 Huger Street
Columbia, SC 29201

Lynne DeLano
Secretary
Department of Corrections
115 East Dakota Avenue
Pierre, SD 57501-3216

Richard Cagle
Jail Administrator
Swisher County Sheriff's Office
136 E. Broadway
Tulia, TX 79088

Michael L. Baughn, Captain
Chief Deputy
Thomas County Sheriff's Office
225 North Court
Colby, Kansas 67701

Bill Aleshire
County Judge, Travis County
Travis County Administration Bldg.
P. O. Box 1748
Austin, TX 78767

Ron Angelone
Common Wealth of Virginia
Department of Corrections
P. O. Box 26963
Richmond, VA 23261

Dean R. McKenzie
Sheriff
Walworth County Sheriff's Dept.
P. O. Box 1004
Elkhorn, WI 53121

Margaret Vonheeder, Director
Division of Management & Budget
Department of Corrections
P. O. Box 41100
Olympia, Washington 98504-1100

James Myers
Dention/Courts Bureau Chief
Washoe County Detention Facility
Washoe County Sheriff's Office
911 Parr Blvd.
Reno, NV 89512

Capt. N. M. Poland
Facility Commander
Whitman County Correctional Facility
P. O. Box 470
Coltax, Washington 99111-0470

Alan J. Lochotaxi, Captain
Yuma County Sheriff's Department
Adult Detention Facility Administrator
145 S. 3rd Avenue
Yuma, Arizona

Ron Webb
Sheriff
Independence County
Sheriff's Department
P. O. Box 4236
Batesville, Arkansas 72503

Marlon Tevis, Asst. Director
Kane County Adult Corrections
777 E. Fabyan Parkway
Batavia, ILL 60510-1499

Janie Hughes Myers
President/CEO
Telecommunications Corporation
9920 S. La Clenega Blvd.
Suite 507
Inglewood, CA 90301

Randolph J. May
Brian T. Ashby
Capital Network System, Inc.
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2404

Robert E. Sigmon
Vice President-Regulatory Affairs
Cincinnati Bell Telephone
201 E. Fourth Street, 102 - 320
P. O. Box 2301
Cincinnati, Ohio 45201

Jean L. Kiddo
Ann P. Norton
Cleartel Communications, Inc.
and Call America
Swidler & Berline, Chartered
3000 K Street, N.W., Suite 300
Washington, DC 20007

James A. Thelen
Director, Operations Support Services
The Cleveland Clinic Foundation
9500 Euclid Avenue
Cleveland, OH 44195

Anthony Marquez
First Assistant Attorney General
Colorado Public Utilities
1580 Logan Street
Office Level 2
Denver, CO 80203

Danny E. Adams
Edward A. Yorkgitis, Jr.
Competitive Telecommunications
Association
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Ellyn Elise Crutcher
Consolidated Companies
121 South 17th Street
Matton, IL 61938

Marianne A. Townsend
Director, Operator Systems
and Regulatory
Conquest Operator Services Corp.
5500 Frantz Road, Suite 125
Dublin, OH 43017

Angela B. Green
Florida Public Telecommunications
Association, Inc.
315 S. Calhoun Street, Suite 710
Tallahassee, FL 32301

Glenn B. Manishin
Neil S. Ende
Gateway Technologies, Inc.
Blumenfield & Cohen
1615 M Street, N.W., Suite 700
Washington, DC 20036

Kathy L. Shobert
Director-Federal Regulatory Affairs
901 15th Street, N.W.
Suite 900
Washington, DC 20005

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, DC 20036

Stephen G. Kraskin
Charles D. Cosson
U.S. Intelco Networks, Inc.
Kraskin & Associates
2120 L Street, N.W.
Suite 810
Washington, D.C. 20037

Donald L. Howell, II
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702

Albert H. Kramer
David B. Jeppsen
Inmate Calling Services Provider
Task Force
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Washington, DC 20005-3919

Judith St. Ledger-Roty
John W. Hunter
Intellicall Companies
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, DC 20036

Walt Sapronov
Charles A. Hudak
InterLink Telecommunications, Inc.
Suite 1450
Three Ravinia Drive
Atlanta, GA 30346-2131

James U. Troup
Arter & Hadden
Iowa Network Services, Inc.
1801 K Street, N.W., Suite 400K
Washington, DC 20006

Douglas F. Brent
LDDS Communications, Inc.
9300 Shelbyville Road
Suite 700
Louisville, KY 40222

Mary J. Sisak
Donald J. Elardo
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, DC 20006

Douglas E. Neel
Vice President, Regulatory Affairs
MessagePhone, Inc.
5910 N. Central Expressway
Suite 1575
Dallas, TX 75206

Cindy Z. Schonhaut
MFS Communications Company, Inc.
3000 K Street, N.W., Suite 300
Washington, DC 20007

Collen M. Dale
Deputy General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Paul Rodgers
Charles D. Gray
James Bradford Ramsay
National Association of
Regulatory Utility Commissioners
1102 ICC Building
P.O. Box 684
Washington, DC 20044

Debra Berlyn
NASUCA
1133 15th Street, N.W.
Suite 575
Washington, D.C. 20005

Randolph J. May
Brian T. Ashby
National Tele-Sav, Inc.
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2404

David Cosson
Steven E. Watkins
National Telephone Cooperative Assoc.
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Edward R. Wholl
William J. Balcerski
NYNEX
120 Bloomingdale Road
White Plains, NY 10605